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Attorney for Defendant-Appellant  
KATHERINE P. KEALOHA

IN THE UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KATHERINE P. KEOLOHA,  
*aka Katherine E. Keoloha* (1),  
LOUIS M. KEOLOHA (2),  
DEREK WAYNE HAHN (3),  
MINH-HUNG NGUYEN,  
*aka Bobby Nguyen* (4),  
GORDON SHIRASHI (5), and  
DANIEL SELLERS (6),

Defendants.

CR NO. 17-00582-JMS

DEFENDANT KATHERINE P.  
KEOLOHA'S MOTION FOR A  
BILL OF PARTICULARS;  
MEMORANDUM OF LAW;  
CERTIFICATE OF SERVICE

**DEFENDANT KATHERINE P. KEOLOHA'S  
MOTION FOR A BILL OF PARTICULARS**

COMES NOW the defendant, KATHERINE P. KEALOHA, by and  
through counsel, Cynthia A. Kagiwada, and hereby moves the court for an order  
directing the government to file a bill of particulars. Defendant is unable to

ascertain from the face of the indictment the nature of the case against her because of the lack of specificity and thus is unable to prepare her defense. Ms. Kealoha moves that the Court order the government to state the following:

**COUNTS 2, 5 and 6**

Obstruction of Official Proceeding (18 U.S.C. § 1512 (c) (2)):

1. The exact act(s) engaged in by defendant Katherine Kealoha which allegedly indicate(s), or tend(s) to indicate that she intentionally and/or knowingly obstructed an official proceeding;
2. The time and place of the act(s) engaged in by defendant Katherine Kealoha which allegedly constitute(s) the obstruction of an official proceeding; and,
3. The names and addresses of person or persons present at the time when the defendant Katherine Kealoha allegedly obstructed an official proceeding.

**COUNT 7**

False Statements to Federal Officer (18 U.S.C. §1001)

1. The exact act(s) engaged in by defendant Katherine Kealoha which allegedly indicate(s), or tend(s) to indicate that she intentionally and/or knowingly made a false statement to a federal officer;
2. The time and place of the act(s) engaged in by defendant Katherine Kealoha which allegedly constitute(s) a false statement to a federal officer; and
3. The names and addresses of person or persons present at the time when the defendant Katherine Kealoha allegedly made a false statement to a federal officer.

This motion is filed pursuant to Federal Rules of Criminal Procedure 7(f) and 47, Crim. L.R. 12.2 (D. Haw.), the attached memorandum of law, the underlying record herein, and such other evidence and argument as the Court may consider at a hearing on the instant motion.

DATED: Kaneohe, Hawaii, December 7, 2017.

Respectfully submitted,

/s/ Cynthia A. Kagiwada  
CYNTHIA A. KAGIWADA  
Attorney for Defendant-Appellant  
KATHERINE P. KEALOHA